



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION  
CENTRO EUROPA BUILDING, SUITE 417  
1492 PONCE DE LEON AVENUE, STOP 22  
SAN JUAN, PR 00907-4127

MAR 22 2011

CERTIFIED MAIL/  
RETURN RECEIPT REQUESTED

Joel E. Robinson, CHMM  
Global Remediation Manager  
General Electric (GE) Consumer & Industrial  
Appliance Park, AP26-100  
Louisville, Kentucky 40225-0001

**RE: Request to eliminate groundwater sampling  
RCRA Facility Investigation (RFI)  
Caribe General Electric Products, Inc.  
Río Piedras, Puerto Rico 00924  
EPA ID: PRD000692590**

Dear Mr. Robinson:

The U.S. Environmental Protection Agency (EPA) has completed the evaluation of the March 6, 2011 letter sent by GE via email requesting the elimination of the groundwater sampling at GE Río Piedras that was originally included in the RFI imposed on July 12, 2010. On the letter sent to GE requesting the RFI, EPA expressed concerns over groundwater contamination at the site based on a letter sent to Luis Dávila on September 3, 1992 in which it is revealed the presence of Volatile Organic Compounds (VOCs) above Maximum Contaminant Levels (MCLs) at the facility. As a result of that letter, EPA recommended additional groundwater characterization.

On recent communications with EPA, GE alleged that the site described in the September 1992 letter is incorrect and corresponds to VOCs contamination at the Caribe GE Distribution Transformer, Inc., Vieques Plant (GE Vieques). According to GE, by that time GE Río Piedras served as the general headquarters of GE Puerto Rico and all correspondence was directed to GE Río Piedras and to its manager, Mr. Luis Dávila. GE claims that it is possible that the GE Vieques case was confused with the Río Piedras facility and consequently put together with the GE Río Piedras records.

As evidence of their claims, GE included on their March 6, 2011 letter the 1994 Amended Closure Plan and the 2007 Quarterly Groundwater Monitoring Report for the GE Vieques facility. In both documents, reference is made to the leach field and the wells (C-1 through C-4) mentioned in the September 3, 1992 letter. According to GE, no such wells or leach field existed at anytime at the GE Río Piedras facility and there is no other documentation that suggests groundwater contamination.

After verifying the available records for the GE Río Piedras and GE Vieques facilities and the information submitted by GE, EPA concurs in eliminating the groundwater sampling that was originally requested on the July 12, 2010 RFI letter. However, this decision is based on the available information and would be reevaluated if additional contamination is found as part of the RFI being conducted for AOC-1 that would indicate that groundwater monitoring is needed.

If you have any questions regarding this matter, please contact Geol. David N. Cuevas at (787) 977-5856 or through e-mail at [cuevas.david@epa.gov](mailto:cuevas.david@epa.gov).

Sincerely yours,



Carl-Axel P. Soderberg, Director  
Caribbean Environmental Protection Division

cc: Ms. María Rodríguez, Director  
Land Pollution Regulation Program  
Puerto Rico Environmental Quality Board  
P.O. Box 11488, Santurce, PR 00910

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